

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>FIELDWOOD ENERGY LLC, <i>et al.</i>,</b>  <b>Debtors.<sup>1</sup></b>	§ § § § § § §	<b>Chapter 11</b>  <b>Case No. 20-33948 (MI)</b>  <b>(Jointly Administered)</b>
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**DECLARATION OF ERIN M. CHOI IN SUPPORT OF DEBTORS' EMERGENCY  
MOTION TO STRIKE LILY CHEUNG'S PURPORTED EXPERT TESTIMONY**

I, Erin M. Choi, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a senior associate of the firm Weil, Gotshal & Manges LLP ("**Weil**"), which maintains an office for the practice of law at 700 Louisiana Street, Suite 1700, Houston, Texas 77002. I am an attorney at law, duly admitted and in good standing to practice in the State of Texas and is admitted to practice before the U.S. District Courts for the Northern, Southern, and Eastern Districts of Texas. I have made an appearance in the above-captioned chapter 11 cases to represent Fieldwood Energy LLC ("**Fieldwood**") and its debtor affiliates, as debtors and debtors in possession (collectively, the "**Debtors**").

2. I submit this Declaration in support of Debtors' Emergency Motion to Strike Lily Cheung's Purported Expert Testimony ("**Motion to Strike**"), filed concurrently herewith in the above-captioned proceeding.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

3. Attached as Exhibit 1 is a true and correct copy of the Deposition Transcript of Lily Cheung, dated June 4, 2021.

4. Attached as Exhibit 2 is a true and correct copy of the expert report of Lily W. Cheung, dated May 24, 2021.

5. Attached as Exhibit 3 is a true and correct copy of the Deposition Notice and Subpoena Duces Tecum to Lily W. Cheung, dated June 2, 2021.

6. Attached as Exhibit 4 is a true and correct copy of Debtors' First Requests for Production of Documents to Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company, and Sirius America Insurance Company, dated April 14, 2021.

7. Attached as Exhibit 5 is a true and correct copy of Exhibit O to the *Disclosure Statement for Fourth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors* [ECF No. 1285-2], dated April 15, 2021.

8. I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: June 11, 2021  
Houston, Texas

/s/ Erin M. Choi

Erin M. Choi